

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE

\* CASE NO. 21-01666/MCF

SHARON ORTIZ ALAMO  
DEBTOR

\*  
\*  
\* CHAPTER 13  
\*

**DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS DOCKET NO. 51  
AND IN COMPLIANCE WITH ORDER, DOCKET NO. 54.**

TO THE HONORABLE COURT:

**NOW COMES, SHARON ORTIZ ALAMO**, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 51, whereby the Trustee requests the Court to dismiss the present Chapter 13 case based on Plan arrears incurred by the Debtor, in the sum of \$1,155.00, in the above captioned case.
2. On June 22, 2022, this Honorable Court issued an *ORDER*, Docket No. 54, whereby the Debtor is Ordered to reply within 30 days to the *Trustee's Motion to Dismiss* (Docket No. 51), which Order is due by July 18, 2022.
3. The Debtor hereby respectfully informs the Court that on July 18, 2022, she made one (1) \$1,155.00 payment, check number 103104100051149, respectively, to cure the arrears in the confirmed Plan. Attached is copy of the payment made to the Trustee, as evidence of having cured the arrears.
4. The Debtor respectfully submits that she is up-to-date in the confirmed Plan payments, thus, respectfully requests the Court to take note of said Plan payments and deny the Trustee's motion to dismiss, Docket no. 51, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing Reply to the *Trustee's Motion to Dismiss*,

Docket No. 51, and in compliance with *Order* dated June 22, 2022, Docket No.54, in the above captioned case.

**I HEREBY CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using the CM/ECF filing system which will send notifications od such to the Chapter 13 Trustee and to all CM/ECF participants; I also certify that I have mailed by United States Postal Services copy of this motion to the following non-participant: the Debtor, Sharon Ortiz Alamo, HCo1 Box 12025, Carolina PR 00987, in the above captioned case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 18<sup>th</sup> day of July, 2022.

*/s/ Roberto Figueroa Carrasquillo*  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
USDC #203614  
ATTORNEY FOR THE DEBTOR  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699/787-963-7699  
Email: [rfc@rfigueroalaw.com](mailto:rfc@rfigueroalaw.com)

THE INSTITUTION'S SIGNATURE - BORDER CONTAINS MICROPRINTING AND A TRUE WATERMARK ON THE BACK - HOLD AT AN ANGLE TO VIEW

**BANCO POPULAR**  
P.O. Box 100000, Ponce, PR 00737-0008  
www.popular.com

PAY: ONE THOUSAND ONE HUNDRED FIFTY FIVE DOLLARS AND  
00/100

TO THE: JOSE R CARRION  
ORDER OF CASO 2101666MCF13

REMITTER: SHARON ORTIZ-ALAMO  
FDIC Member and Federal Reserve System

Check No 1031041000051149  
Date: 07/10/2022

**\$1,155.00**

Over \$25,000.00 Two Signatures Required

*Sharon Ortiz-Alamo*  
Authorized Signature

104100051149 1021502011 000001031161